

EXHIBIT H

In re: MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026

Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition
Testimony of Beth Andrews and the GUC Trust and New GM's Objections Thereto

Beth Andrews November 15, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
11:14	11:25	
16:20	16:25	
17:14	18:1	
18:15	18:18	Vague and ambiguous; Compound (FRE 611(a)); Lack of foundation (FRE 602).
18:22	18:24	Vague and ambiguous; Compound (FRE 611(a)); Lack of foundation (FRE 602).
22:14	22:20	
22:24	22:25	
25:2	25:9	
26:1	26:2	
26:6	26:13	
27:9	27:10	
27:14	27:16	
30:22	31:16	
39:11	39:16	Relevance; Vague and ambiguous; Lack of foundation (FRE 602).
39:18	40:1	Relevance; Vague and ambiguous; Lack of foundation (FRE 602).
40:5	40:14	Relevance (40:5-14); Vague and ambiguous; Lack of foundation (FRE 602) (40:5).
42:19	42:20	Vague and ambiguous; Lack of foundation (FRE 602).
42:23	43:6	Vague and ambiguous; Lack of foundation (FRE 602) (49:23).
43:8	43:14	
46:8	47:9	
47:11	47:25	Vague and ambiguous; Lack of foundation (FRE 602); Cumulative (47:22).

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
48:5	49:10	Vague and ambiguous; Lack of foundation (FRE 602); Cumulative (48:5).
56:6	56:8	
56:12	56:15	
56:17	56:21	
59:3	59:16	Relevance.
59:23	60:9	Relevance.
60:11	60:15	Relevance.
60:20	61:10	Relevance.
61:18	64:1	Relevance.
64:5	64:15	Relevance
64:19	64:20	Relevance
70:21	71:6	Vague and ambiguous (71:3-6).
71:8	71:9	Vague and ambiguous.
71:16	71:21	Vague and ambiguous; question is incomplete as stated.
72:13	72:15	Asked & Answered (FRE 403)
72:20	72:20	
72:21	73:25	Vague and ambiguous; Mischaracterizes testimony (73:21–73:25).
74:3	74:20	Vague and ambiguous; Mischaracterizes testimony (74:3-4); Lack of foundation or personal knowledge (FRE 602); Calls for speculation (74:17-20).
74:25	75:8	Lack of foundation or personal knowledge (FRE 602); Calls for speculation.
75:13	75:22	Lack of foundation (FRE 602); Calls for speculation (75:13-15).
75:25	76:9	
78:16	80:1	
80:15	81:6	
82:21	84:6	
89:24	90:3	Lack of Foundation (FRE 602)
90:9	90:18	Lack of Foundation (FRE 602)
90:21	90:22	
98:24	99:2	

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
99:7	99:21	
100:3	100:6	
100:17	100:19	
100:23	101:4	Vague and ambiguous.
101:7	101:8	Vague and ambiguous.
101:11	101:23	Vague and ambiguous; Lack of foundation (FRE 602 (101:13-23))
102:2	102:9	Vague and ambiguous; Lack of foundation (FRE 602) 102:2-3).
103:6	104:11	Vague and ambiguous; Lack of foundation (FRE 602) (104:5-11).
104:14	104:22	Vague and ambiguous; Lack of foundation (FRE 602) (104:16-22).
104:25	106:14	Vague and ambiguous; Lack of foundation (FRE 602) (104:25).
107:2	109:2	
109:10	110:22	Vague and ambiguous; Lack of foundation (FRE 602) (110:20-110:22).
110:25	111:21	Vague and ambiguous; Lack of foundation (FRE 602) (110:25-111:2); Mischaracterizes testimony (111:13-21).
111:24	111:25	Mischaracterizes testimony.
115:4	115:7	
118:6	120:16	Calls for speculation; Lack of foundation (FRE 602) (120:12-21).
120:20	121:1	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602) (120:23-121:1).
121:8	121:15	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602).
122:5	122:18	Relevance.
123:19	124:11	Relevance.
124:23	125:2	
127:4	127:4	
127:10	127:11	
128:24	129:4	Calls for speculation; Lack of foundation (FRE 602).

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
130:22	131:23	
132:2	132:3	
132:12	134:15	Vague and ambiguous; lines 14 and 15 are not part of the designated question; Lack of foundation (FRE 602) (134:14-15).
134:24	135:2	Vague and ambiguous; Lack of foundation (FRE 602).
135:5	135:12	
135:24	136:22	Vague and ambiguous; Lack of foundation (FRE 602) (136:15-22).
136:24	137:2	Vague and ambiguous; Lack of foundation (FRE 602).
137:17	138:15	Mischaracterizes testimony (138:10-15).
138:17	138:18	Mischaracterizes testimony.
138:23	139:11	Mischaracterizes testimony; Compound (FRE 611(a));Lack of foundation (FRE 602) (139:4-11).
139:16	140:15	Mischaracterizes testimony; Compound (FRE 611(a));Lack of foundation (FRE 602) (139:16); Lack of foundation (FRE 602) (140:9-23).
140:18	140:25	Lack of foundation (FRE 602).
142:1	143:4	Lack of foundation (FRE 602) (142:22-143:4).
143:7	143:16	Lack of foundation (FRE 602).
143:20	144:1	Lack of foundation (FRE 602).
144:5	145:5	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602) (145:5-7).
145:7	145:18	Calls for speculation; Lack of foundation (FRE 602) (145:13-18)
145:21	146:2	Calls for speculation; Lack of foundation (FRE 602)
146:6	146:15	Calls for speculation; Lack of foundation (FRE 602) (146:6-7)
150:15	150:19	Vague and ambiguous; Lack of foundation (FRE 602).

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
150:22	150:22	Vague and ambiguous; Lack of foundation (FRE 602).
152:1	152:11	
152:15	154:11	Cumulative (154:9-11).
154:15	155:24	Cumulative (154:15–155:1).

GUC Trust and New GM's Counter Designations of the Deposition Testimony of Beth Andrews and the Plaintiffs and Participating Unitholders' Objections Thereto

Beth Andrews November 15, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
9:14	10:12	
18:3	18:5	This is not a valid counter-designation, as neither completeness or fairness requires that it be considered contemporaneously with affirmatively designated content (FRE 106); relevance (401-403).
18:8	18:12	This is not a valid counter-designation, as neither completeness or fairness requires that it be considered contemporaneously with the designated content (FRE 106); relevance (401-403).
23:2	23:15	This is not a valid counter-designation, as neither completeness or fairness requires that it be considered contemporaneously with the designated content (FRE 106); relevance (401-403 – this is irrelevant to the issue of whether or not there was a binding agreement between the parties).
25:11	25:25	
28:13	28:25	This is not a valid counter-designation, as it does not

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		"complete" anything affirmatively designated and fairness does not require that it be considered contemporaneously with the designated content (FRE 106); relevance (401-403); foundation (601, 602).
34:21	35:4	This is not a valid counter-designation, and it is not clear which affirmatively designated content this excerpt could possibly purport to "complete" (FRE 106); relevance (FRE 401-403).
41:15	41:17	This is not a valid counter-designation, and further is contextually incomplete in and of itself (omits the relevant date discussion) (FRE 106); mischaracterizes testimony; relevance (401-403).
42:3	42:7	This is not a valid counter-designation, as it does not "complete" anything affirmatively designated and is in fact incomplete/out-of-context in and of itself (omits the relevant date discussion) (FRE 106); mischaracterizes testimony; hearsay (801, 802).
53:17	53:22	Not a valid counter-designation (does not "complete" anything affirmatively designated) (106); hearsay (801, 802); hearsay within hearsay (805); lacks foundation/personal knowledge (601, 602).
54:24	55:4	Relevance (401-403); hearsay (801, 802); not a valid counter-designation because it does not "complete"

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		anything affirmatively designated and fairness does not require that it be considered contemporaneously with the designated content (106).
57:3	57:5	This is not a valid counter-designation as it does not "complete" anything affirmatively designated and fairness does not require that it be considered contemporaneously with the designated content (106); Relevance (401-403).
68:6	68:13	This is not a valid counter-designation as it does not "complete" anything affirmatively designated and fairness does not require that it be considered contemporaneously with the designated content (106); Improper opinion evidence (702); Foundation (601, 602).
68:15	68:19	This is not a valid counter-designation as it does not "complete" anything affirmatively designated, and fairness does not require that it be considered contemporaneously with the designated content (106); Improper opinion evidence (702); Foundation (601, 602).
69:23	70:1	Not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106) ; 403 (more confusing than probative); vague and ambiguous; foundation (601, 602).

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
70:6	70:17	Not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); 403 (more confusing than probative); vague and ambiguous.
72:8	72:12	Incomplete on its face and further not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); hearsay (801, 802); vague and ambiguous.
74:1	74:2	Incomplete on its face and further not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); improper designation of record objections (401-403 – irrelevant).
74:21	74:24	Incomplete and not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); improper designation of record objections (401-403 – irrelevant).
75:9	75:12	Incomplete and not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); improper designation of record objections (401-403 – irrelevant).
77:21	78:4	Not a valid counter-designation (does not “complete” anything

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		affirmatively designated) (106); hearsay (801, 802); lacks foundation/ personal knowledge (601, 602); calls for speculation/improper opinion (701, 702).
80:4	80:14	This is not a valid counter-designation, as neither completeness or fairness requires that it be considered contemporaneously with the designated content (FRE 106); relevance (401-403); lacks foundation (601, 602).
82:11	82:20	Hearsay; not a valid counter-designation for completeness or fairness purposes (FRE 106); relevance (401-403); lacks foundation (601, 602); calls for speculation.
84:7	84:23	Not a valid counter-designation for completeness or fairness purposes (FRE 106); relevance (401-403); lacks foundation (601, 602); hearsay (801, 802).
88:22	89:9	Not a valid counter-designation for completeness or fairness purposes (FRE 106); relevance (401-403); lacks foundation (601, 602); hearsay (801, 802).
99:3	99:6	
100:7	100:9	Lacks foundation (601, 602); not a valid counter-designation for completeness or fairness purposes (FRE 106); relevance (401-403); calls for speculation.
100:13	100:16	Lacks foundation (601, 602); not a valid counter-designation for

Beth Andrews November 15, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		completeness or fairness purposes (FRE 106); relevance (401-403).
100:20	100:22	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – irrelevant).
101:5	101:6	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
104:12	104:13	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
104:23	104:24	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
110:23	110:24	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
112:1	112:7	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation (601, 602); relevance (401-403).
112:12	113:3	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation (601, 602); relevance (401-403); hearsay (801, 802).

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
113:7	113:20	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation (601, 602); relevance (401-403); hearsay (801, 802); hearsay within hearsay (804).
113:23	114:3	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation or personal knowledge (601, 602).
120:17	120:19	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
121:2	121:7	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
125:7	125:15	Incomplete (starts with an answer, preceding question not designated) (106); Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); hearsay within hearsay (804); lacks foundation / personal knowledge (601, 602).
126:20	127:2	Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
127:5	127:9	Not a valid counter-designation for completeness or fairness purposes (106); lacks foundation / personal knowledge (601, 602).

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
127:14	128:10	Incomplete (starts with an answer, preceding question not designated) (106); not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
132:4	132:7	Not a valid counter-designation for completeness or fairness purposes (106).
135:3	135:4	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
136:23	136:23	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
138:16	138:16	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
140:16	140:17	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
150:20	150:21	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403), and the selective designation of certain record objections in the middle of

Beth Andrews November 15, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		designated testimony and not others is incomplete in and of itself.
154:12	154:14	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
156:11	157:1	This is not a valid counter-designation to any of the designated content, and fairness/completeness requirements do not necessitate it being considered contemporaneously therewith (106).
158:1	158:4	Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); 401-403.
158:7	158:22	Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); 401-403.
158:25	159:8	Lacks foundation (601, 602); not a valid counter-designation (106).
163:12	163:15	Lacks foundation (601, 602); not a valid counter-designation (106); hearsay (801, 802); calls for speculation.
163:21	164:2	Not a valid counter-designation for completeness or fairness purposes (106); lacks personal knowledge/foundation (601, 602); hearsay (801, 802); calls for speculation.
164:9	164:17	Not a valid counter-designation for completeness or fairness purposes (106); lacks personal knowledge/foundation (601, 602); calls for speculation.